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**Cc:** [Svendsgaard, Lisabeth](#); [Petty, Amy](#)  
**Subject:** SERVICE BY EMAIL ONLY Irving et al v. City et al, Supplemental Documents to Plaintiffs' First Consolidated Set of Requests  
**Date:** Wednesday, December 14, 2022 4:08:00 PM

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Counsel: The City and Official Capacity Defendants produce additional documents responsive to Plaintiffs' First Consolidated Set of Document Requests, consisting of numbers COR 014591 through COR 014747. We produce these documents subject to the objections previously asserted in our responses and objections dated 9/19/22 and under the same conditions described in our 10/12/22 production. All documents produced are subject to protection under the orders previously entered by the Court. The nature of each category of documents is self-evident.

During the parties' meet-and-confer conference, the parties discussed searches of email accounts. The parties agreed to limit searches to the email accounts of Abdullah, Gay, Rattelade, Rolfe, and Monroe and to the following search terms:

1. For the period 8-16-2018 through June 13, 2020, search those mailboxes for the following terms: "Aspirin," "Dennis Williams"
2. For the period 5-13-2020 through June 13, 2020, search those mailboxes for the following term: "Burgundy"

A request has been submitted to City IT for member of the IT department to run the searches. In the meantime, the City Attorney's Office has conducted its own preliminary searches based on these criteria and is producing documents that the preliminary searches revealed. The documents produced may be all responsive documents to the agreed searches; we will provide any additional documents subject to production in a later supplemental response.

Beth Svendsgaard will send you a SharePoint link to access the documents. Should you have any questions, please let Amy and me know. Thanks to all, Dottie

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